

HOW TO MOVE TOWARDS ENQA MEMBERSHIP?-MACEDONIAN QUALITY ASSURANCE AGENCY AGAINST ENQA EUROPEAN STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN HIGHER EDUCATION

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Abstract

Massification of higher education (HE), the entrance of new Public Management agenda and internationalization and globalization of HE prompts an increased pressure for accountability and the need for intensified quality control (Van Vught and Westerheijden 1994, Woodhouse and Stella 2006, Hopbach, 2012). In the context of expanded (state and private) higher education providers, the national quality assurance (QA) bodies, policies and practices are expected to play an important role in safeguarding the HE quality.

This paper assesses the conformity of policies and practices of the Macedonian Higher Education Accreditation and Evaluation Board (HEAEB) with the European Standards and Guidelines (ESG) for Quality Assurance (QA) on external QA Agencies released in 2005 by the European Association for Quality Assurance in Higher Education (ENQA). Discussing HEAEB progress against ENQA membership criteria linked to its official status, activities, use of external procedures for QA, resources, mission, its independence and accountability procedures, it answers the question how close HEAEB is to achieve full membership. The multivariate analysis showed partial compliance at five and non-compliance at three of the total of eight ENQA standards, suggesting significant discrepancy between tasks prescribed under the HE Law and the HEAEB practices. HEAEB has not assumed yet the role for performing external evaluation of HEI, whereas ex-ante, paper-based and input oriented accreditation of higher education institutions and study programs proved to be ineffective. The research findings suggest lack of internal transparency and accountability procedures, no legal entity status and unfavorable situation with human and financial resources. This puts in question the operational independence of HEAEB and its efficiency. The paper provides recommendations for improved HEAEB effectiveness and achievement of full compliance.

Key words: *higher education, quality assurance, compliance, European standards and guidelines for QA.*

Introduction

Massification of higher education (HE), the entrance of new Public Management agenda and internationalization and globalization of HE prompts an increased pressure for accountability and the need for intensified quality control (Van Vught and Westerheijden 1994, Woodhouse and Stella 2006, Hopbach, 2012). In the context of expanded (state and private) higher education providers, the national quality assurance (QA) bodies, policies and practices are expected to play an important role in safeguarding the HE quality. The establishment of the European Association for Quality Assurance in Higher Education (ENQA) and of a European Register for Quality Assurance Agencies (EQAR), as well as development of the European Standards and Guidelines (ESG) for QA has denoted a new chapter in the Bologna process.

ENQA was established in 2000 with the mission to “contribute significantly to the maintenance and enhancement of the quality of European higher education at a high level”. In May 2005, the European ministries endorsed the “Standards and Guidelines for Quality Assurance in the European Higher Education Area” (ESG) document produced by ENQA and E4 group (ENQA, EUA, ESU and EURASHE) to meet the need for a common understanding of quality assurance in the EHEA. EQAR was established in 2008 as a web-based information tool on trustworthy agencies with voluntary registry based on compliance with the ESG. The ESG comprises a set of standards for agencies that wish to be considered as trustworthy and professional in the performance of their functions in the EHEA. The ESG were “designed to be applicable to all higher education institutions and quality assurance agencies in Europe, irrespective of their structure, function and size, and the national system in which they are located (ESG, p.12) [...] The standards [...] reflect basic good practice across Europe in external quality assurance, but do not attempt to provide detailed guidance about what should be examined or how quality assurance activities should be conducted.” (ESG, p.15). Although not legally binding, “the ESG quickly turned into a compliance tool since ENQA regarded compliance with ESG as core of its membership criteria since 2004” (Hopbach, 2012). In order to become member of ENQA and to be granted admission in the EQAR, QA agencies are required to “successfully undergo an external review and to demonstrate that they sufficiently comply with the ESG” (ENQA).

This research paper assesses the conformity of the Macedonian Higher Education Accreditation and Evaluation Board (HEAEB) with the ENQA standards on external QA Agencies. It instigates HEAEB progress against eight ENQA membership criteria (2005 version) providing overview on its official status, mission, independence, the use of external quality assurance procedures for higher education, accountability procedures, its activities and resources. Illustrating some constraints under which HEAEB is working, it also draws policy conclusions and provides recommendations for improving HEAEB effectiveness and achieving full compliance.

The multivariate analysis has encompassed a combination of qualitative and quantitative data. In order to generate data needed, the paper has used primary and secondary data: analysis of the national legislation and internal HEAEB policies and procedures (HE Law, HEAEB Guidance and Books of rules for QA, etc.), survey with random sample of 237 regular, senior years students (0,54% of the student body) and 76 university teachers (2,79% of the teachers body) and a semi-structured interview with HEAEB members and other people familiar with its work. The survey was conducted at four of the five state universities in the country: the University "Ss. Cyril and Methodius", Skopje (UKIM), the University "St. Kliment Ohridski", Bitola (UKLO), the University "Goce Delcev" in Shtip (UGD) and the State University in Tetovo (DUT). The research evidence was judged against the existent four ENQA descriptors for compliance with ESG: fully compliant; substantial compliant; partially compliant and no compliant.

Macedonian Quality Assurance Agency (HEAEB) against ENQA membership criteria

The quality assurance system of Macedonian HE is regulated according to the "general model" of quality assessment (van Vught & Westerheijden, 1993) with (1) national coordinating body; (2) institutional self-evaluation, (3) peer-review external evaluation and (4) published reports model elements. The current system consists of evaluation (self-evaluation, external evaluation and evaluation of the teaching staff), of accreditation (of institutions and study programs) and of other activities for QA (university ranking). The Law on Higher Education (LHE) provides for mandatory cyclical self-evaluation by HEIs every three years, for external

evaluation by HEAEB every five years and for national ranking of HEIs (done by institution selected by the education Minister) every two years.

The research findings showed partial compliance at five and non-compliance at three of the total of eight ENQA standards, suggesting at the same time significant discrepancy between HEAEB policies and practices. HEAEB is the only agency for QA in the country that decides on accreditation for all study programs at public and private universities, of study programs for second and third cycle at scientific institutes and on accreditation for establishing new private HEIs. HEAEB provides only opinion of accreditation for new state HEIs, while the Ministry makes final decision upon the site-visit inspection. The accreditation is done based on paper, its input oriented and is done more as a formal check on whether the project embeds all the required documentation and proof that the minimum [national] norms and standards for establishing HEI and carrying out HE activity are meet (premises, equipment, number of teaching staff and their qualifications etc.). HEAEB can renew and/or redraw the accreditation based on the follow-up assessment of the “quality of HEI activities, research, art and other professional work of HEI, of the university staff and study programs of the HEIs”.

Uneven treatment in accreditation of new (public versus private) HEIs may suggest that the state is not equally interested in quality of all HEI and in quality of the entire HE. This is quite challenging and causes concerns in the condition of growing number of private and (new) public HEIs and universities as well as of over 60 state funded study programs dispersed all over the country. How the state will protect over 7,000 students studying at private HEIs (2012/2013) and ensure that they will get the minimum quality? Furthermore, *“Dispersed study programs were not subject of accreditation [at all], since these study programs were already accredited by/at their home HEIs”* (1: 11.10.2012). Even we accept this as relevant reason for the study programs it remains unclear how they were opened without being examined against the minimum norms and standards for HE activity prescribed by Law. Anemic reactions of general public and particularly the academic community yielded in „quiet acceptance“these studies.

Basic policies, standards and procedures for external QA exist and are regulated by the HEAEB Book of Rules (Official Gazette no.151/2012) and Guidelines for external evaluation (Official Gazette no.67/2013), yet they are not employed in practice. The first cycle of external evaluation of all state HEIs and the only one that has been performed to date by a national QA body (the Agency for Evaluation of HE at the time) took place in the period 2002-2004. Most of

these reports (including the external evaluation reports of UKIM, UKLO and of the SEEU at Tetovo conducted by the European University Association (EUA) were released at their web sites. The outcomes of these external evaluation processes have so far no influence on the level of funding of HEIs, but should primarily serve for improvement purposes. However, based on the summative assessment grade/mark of 4 separate assessment areas denoted in HEAEB Guidelines for external evaluation, a HEI could be awarded 3 or 5 years accreditation.

The review of HEAEB mandate and list of tasks assigned by the LHE suggests a discrepancy on what HEAEB needs to do and what HEAEB really does. Five years from the merger of Evaluation Agency and Accreditation Board and from the merger of accreditation and evaluation functions into one national agency –the Higher Education Accreditation and Evaluation Board, HEAEB still performs accreditation and not external quality assurance under its core function and on a regular basis. LHE provisions from January, 2015 assigned additional task to HEAEB to arrange external state exam for students as a way to check the objectivity of the internal assessment done by their university professors. Being observed by the academia as direct interference into the university autonomy, massive students' protests organized at the beginning of 2015 by the students and professors plena challenged the external assessment policy and put new LHE on hold.

Although recognized by the LHE as “independent body” responsible for QA, HEAEB has no “legal entity” status, but operates as a/under the Department of the Ministry of Education and Science. 32,6% of the survey respondents believe that HEAEB should operate under the auspices of the universities, 31,6% within MoES and 28,7% that should operate independently from the government and the universities. As stressed by one of the interviewees, *“the Government has no interest to see HEAEB established as a separate legal entity, independent from MOES. (1: 11.10.2012)*. The scarce resources are oftentimes stated as main obstacle. The status on May, 2014 didn't speak favorably on HEAEB available resources, both human and financial. Still, one of the interviewed HEAEB members has been optimistic that *“There is an organogram and an assessment for minimum 11 positions needed for normal functioning of HEAEB, recruitment preparations are done and this problem should be mitigated soon”* (5: 15.05.2014). At the time of the research, only 1 out of 23 HEAEB members and none of the 5 HEAEB supporting personnel have been trained in quality assurance. There has been no funding allocated for training of the HEAEB staff and donor funded projects on QA are seen as the only

opportunities for training. The annual HEAEB budget allocated by the state is not publicly available and is not “visible”, since it’s neither presented as explicit budget line /allocation in the Ministry budget, nor can be found under the budget allocated for higher education. Administration load of HEAEB is huge due to continuous reaccreditation submissions by HEIs that should provide for compliance of their study programs with the new law amendments. There is no publicly available document that describes the accreditation fee policies. The interviews with the HEAEB members reviled problems with the regular and timely payment of monthly fees to the HEAEB members, noting that “*the payments are either late or non-existing, whereas nobody really knows where the funds from the HEAEB own revenue account go.*” (4: 12.05.2014). HEAEB current premises seem to be inappropriate for the nature of its work, improperly marked and with no clear sign/directions on how to reach it. HEAEB is moderately equipped with furniture and other necessary IT equipment. Contrary to the article 77 provision of the LHE, neither Ministry, nor the HEAEB has any electronic system for maintenance of accreditation data record. These suggest that HEAEB cannot perform its task in effective and efficient manner.

HEAEB mission is defined in the article 7 of its Book of rules (Official Gazette no.151/2012) as “advancement of the system of assuring continuous quality of the higher education process”. Still, it’s not accompanied by clear and explicit goals and objectives for its work, nor there any management plan as publicly available document. Whereas ENQA standards emphasize that the agencies must be independent from Ministries, from HEIs, from the Government, from the political parties and other stakeholders, HEAEB confronts number of challenges regarding its operational efficiency, consistency and independence. Although it’s impossible and not expected HEAEB to be totally organizationally independent and isolated, its current status compromises its organizational and operational (in)dependence on the government and political parties. “*Whereas the HEAEB members are assigned for 4 years term without possibility for replacement, the members of HEAEB are changing following the change of the parties in the ruling coalition*” (1: 11.10.2012). This doesn’t imply per se that these HEAEB members lack objectivity, professionalism and honesty, yet the way they are appointed suggests that they are inclined to make decisions in line with /under the influence of their nominal political party’ philosophy/ideology. Therefore, the opinion of 26,7% of the professors and

60,7% of the students respondents from UKIM that HEAEB should be consisted of a permanent team of professionals doesn't come as a surprise.

Although LHE provisions provide for obligation to HEAEB members to report in a case of a conflict of interest, there is no indication that this practice exists. However, interviewees pointed out that HEAEB pays attention in the nomination of the experts for the accreditation commissions by excluding the experts from HEI under review for accreditation. HEAEB Book of Rules provides for the external experts to participate into the work of HEAEB without right to vote and decide. The current QA system relies entirely on domestic reviewers that in a small country like Macedonia can compromise the impartiality and objectivity of their judgment, can foster collegial solidarity and emerge quasi-competition among the HEIs. The observations of all interviewees have been that the students are insufficiently consulted in the QA processes. ..."The two students that serve as HEAEB' members as representatives of the Student Parliament seem to be uninterested, non-attentive, lack commitment and oftentimes do not show up at the HEAEB meetings which takes place once per month" (1: 11.10.2012).

Accountability procedures are not strengths of HEAEB. According to the LHE (article 69) "the evaluation results on the quality of higher education are embedded into reports that are publicly available". HEAEB publishes report on the external evaluation results that "submits to the Government of RM, to the Ministry of Education and to the HEI being subject to external evaluation" (article 71). Although one of the interviewees noted that the HEAEB prepares and submits annual reports to MOES, they are not publicly available. There are no summary periodical reports on HEAEB work, nor publicly available written documents and/or other evidence for the existence of the internal quality assurance procedures of HEAEB which include any internal and/or external feedback mechanism. HEAEB web site is still under construction (status end of May, 2014), so the list of accredited institutions is available at the web site of MOES. HEAEB Book of rules envisages a process of self-evaluation of its work (to be performed once a year) and for an external evaluation (to be performed by ENQA), but at the time of research they have not been conducted yet. There is an accreditation appeal procedure described in details in the LHE. However, the question rises on whether the Macedonian court is the right place of such appeals, or it should be other appeal body within the HEAEB.

Recommendations - Moving towards ENQA membership???

Macedonian academic community lacks serious debate on many issues linked to the implementation of the Bologna process, including the issue of quality and system of quality assurance. A wide professional discussion is needed on QA by including all stakeholders and by encouraging the academia to walk from a reactive to proactive stance. It is necessary to rethink and revise the entire system of quality assurance, including the role, organizational setting and functionality of HEAEB. The state must ensure that all preconditions for making the HEAEB impartial and fully operational are in place. HEAEB should develop the necessary internal policies and accountability procedures as imperative for fulfilling assigned European standards for ENQA membership.

Compliance with ESG standards on the official status is essential for full membership of every national agency in ENQA. Providing HEAEB with a legal entity status is only one of the steps that should be undertaken closely linked to other standards and criteria for independence in decision making. HEAEB should have a Statute and should manage and decide upon its finances from both funding sources autonomously (those allocated from the state budget and the funds received from the accreditation fees paid by the HEIs).HEAEB should prepare a long term development strategy and a management plan that will explore in details the initial steps vital for independent and professional functioning. There is a need of revision of organizational setting and for commencing of a Managing Board as highest governing body of HEAEB that will be elected by the Macedonian Parliament upon the nomination of the Interuniversity conference, university Senates, students' organizations and the Government. The accreditation and external evaluation functions within HEAEB should be separated in two different departments. Because of the closer linkage with the higher education qualifications and its recognition, on a mid to a long term, an option for transferring ERIC/NARIC center under HEAEB should be explored, to become integral and organizational part of HEAEB. It is necessary to start establishing a department for analytics that will gather and analyze data for higher education system in RM, as well as a separate appealing commission or (small) department that will review appeals to HEAEB accreditation decisions.

Without adequate human and financial resources, HEAEB cannot progress in the development of the quality assurance procedures and achieve greater work efficiency. Based on

the number of positions and staff competences determined by the organizational structure assessment, HEAEB should develop a comprehensive professional development plan and receive the necessary funding for systematic training of HEAEB members in accreditation and in external evaluation. The staff and the evaluators should be given permanent re-training. Further efforts are needed to equip HEAEB with necessary technical equipment and electronic data supporting system. This will enable a linkage with the existing electronic systems and data bases available at HEIs/universities as I-Know system and in future, with the data based on the teaching and research faculty staff engaged in higher education and research. As inevitable in the process of building quality culture, HEAEB should develop its own internal quality assurance procedures, using the PDCA (Plan-Do-Check-Act) principles. They should depict the workflow of documents and procedures, as well as the way of receiving and processing feedback information from the involved experts, the institutions and the students as key stakeholders in these processes. As envisaged with its Book of Rules, a Code of conduct should be developed together with a clear conflict of interest policy. Remuneration of HEAEB members, employees, experts and ad-hoc engaged persons must be regulated with an internal book of rules.

Accreditation of HEIs in Macedonia cannot be seen as warranty of obtained quality standards of study programs, but rather as warranty that the minimum defined norms and criteria for establishing HE and for practicing HE activities have been met. Continuous reaccreditation of already accredited study programs only for the purpose of formal compliance with the frequent law amendments is unnecessary and twists the real purpose and the meaning of reaccreditation. Reaccreditation of the study programs should be based on periodical evaluation findings (that doesn't exist at the moment in RM). 5 years period foreseen with the Law is ideal period for revalidation/renewal of accreditation. HEAEB needs to consolidate and advance its existing activities (accreditation of institutions and programs) and to gradually introduce new activities - audit (in some countries known as periodic evaluation) and external evaluation of HEIs that will contribute to advancing the entire system of quality assurance in Macedonian higher education. The exchange of experience and cooperation with other European agencies for quality assurance in accreditation and recognition of joint degree programs qualifications is also needed. HEAEB should consult the methodologies and protocols for accreditation of these programs developed by the QA agencies in other countries, but also should consult current initiatives and best practices from the unified European methodology for the Joint Degree programs of the European

Consortium for Accreditation in Higher Education (ECA), including A Guide to Assessing the Quality of Internationalisation, as well as the Guidelines for Good Practice for Awarding Joint Degree. The participation in regional and European projects and initiatives together with other QA agencies should be encouraged that will improve the knowledge of the HEAEB staff, but also its visibility, transparency and its public image.

Along with the consolidation of resources and current activities, HEAEB should focus on piloting the external evaluation and strengthening the capacities of its employees that in two to three years' time will be equipped to manage the process of external evaluation. HEAEB should demonstrate consistency in the way the procedures are implemented as well as focus on regular external evaluation and cyclical evaluation reports. The first preparatory step in the external evaluation processes should be developing and disseminating a Guide for higher education quality that should include the ENQA European standards and guidelines for QA translated into Macedonian, a vocabulary and/or a glossary of all internationally accepted and used terms related to the QA processes, as well as the book of rules and legal acts that address different aspects of these processes. This could become a basic resource pack for initial support of HEIs. The glossary needs to be developed in close consultation with education experts and linguists since its development also assumes creating new (currently non-existing) education terminology. HEAEB should also create its own pool of experts, a data-base or a register of experts from different scientific areas with experience in evaluation processes (domestic and foreign). The existing lists of experts for regulated professions of EURASHE should be taken into account. The involvement of external reviewers outside Macedonia will require of the HEIs to conduct the self-evaluations and reviews in English which includes additional translation costs. Yet, HEIs should consider accepting this extra burden as a step towards increased transparency and credibility of the interview panels and of the external evaluation process. The similar approach should be applied for the students' representatives in the evaluation panels. The accent should be put on improvement and not (only) on the control of quality.

In order to demand transparency and accountability from the HEIs, HEAEB should demonstrate accountability by itself. It is critically for HEAEB to get involved into its self-evaluation as pre-requisite for external evaluation and full membership application at ENQA, which will help to all people involved with HEAEB (the administrative staff and the HEAEB members) to reflect on and improve its work. A functional and user-friendly web site is urgently

needed where all evaluation, annual and other reports deriving from HEAEB' work will be published and shared with the HEAEB perspective Board and other stakeholders (MoES, the Parliament of RM, the universities), as part of its routine practices. Last but not the least, HEAEB has to start preparing public analytical reports on Macedonian higher education system and of the quality assurance system.

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